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Attorney for Proposed Intervenors

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 WESTERN DIVISION—LOS ANGELES**

YITZCHOK FRANKEL; ) Case No. 2:24-cv-04702-MCS-  
 JOSHUA GHAYOUM; )  
 EDEN SHEMUELIAN, and )  
 DR. KAMRAN SHAMSA )

Plaintiffs, )

vs. )

REGENTS OF THE UNIVERSITY OF ) **DECLARATION OF ROE 6 IN**  
 CALIFORNIA; MICHAEL V. DRAKE, ) **SUPPORT OF MOTION FOR**  
 President of the University of California; ) **LEAVE TO INTERVENE**  
 GENE D. BLOCK, Chancellor, University )  
 of California, Los Angeles; DARNELL )  
 HUNT, Executive Vice-President and )  
 Provost; MICHAEL BECK, )  
 Administrative Vice Chancellor; )  
 MONROE GORDEN, JR., Vice )  
 Chancellor; and RICK BRAZIEL, )  
 Assistant Vice Chancellor, each in both )  
 his official and personal capacities, ) **Judge: Hon. Mark C. Scarsi**

Defendants. )

I, ROE 1, declare as follows:

1. This declaration is submitted in support of Proposed Intervenor's Motion for Leave to Intervene.

2. I am over the age of 18 and am capable of making this declaration pursuant to 28 U.S.C. § 1746. I have personal knowledge of all of the contents of this declaration.

3. I am a professor at UCLA. I have been involved in pro-Palestinian protest since October 7, 2023. I have been a professor at UCLA for eight years.

4. I am deeply concerned about how the Frankel injunction mixes up anti-Zionism and antisemitism. I worry that all pro-Palestinian protests will be banned.

5. I have been at protests since the issuance of the Court's Preliminary Injunction on August 18, 2024.

6. I was present at several protests where UCPD responded differently than how they had previously responded to protest. They arrive faster, in larger numbers, and in riot gear in response to protest. This is most obvious when protest might be interpreted to block a sidewalk or walkway.

7. On more than one occasion, university officials mentioned the Frankel injunction in reference to how UCLA was responding to protest. Police and Student Affairs have allowed other TPM violations while focusing on perceived blocking aggressively. At no time was there an allegation that any of these protests had the purpose of preventing Jewish students, or any other member of a protected class, from accessing campus.

8. Because of the aggressive police and university response to pro-Palestine protest, protest has been limited to a very small section of UCLA's campus. It feels like all pro-Palestine protest is prohibited.

9. I am also concerned about the conflation of anti-Zionism and antisemitism and how that could limit teaching and research on Palestine. I fear that discussing anti-Zionism will be considered antisemitic, be banned, and potentially subject me to discipline.

1           10. I am also concerned that the university has agreed to share private disciplinary  
2 records of non-parties to the case. Disclosing such information could lead to doxing and potential  
3 employment consequences.  
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5           I declare under penalty of perjury under the laws of the United States that the foregoing is true  
6 and correct. Executed this 2nd day of May, 2025, at Los Angeles, California.  
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